

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DONNA CURLING, *et al.*

Plaintiffs,

v.

BRAD RAFFENSPERGER, *et al.*,

Defendants.

CIVIL ACTION

FILE NO. 1:17-CV-2989-AT

**DEFENDANTS’ UNOPPOSED MOTION FOR
EXTENSION OF TIME TO REPLY TO PLAINTIFFS’
SUMMARY JUDGMENT BRIEFING**

State Defendants and Fulton County Defendants (collectively, “Defendants”) respectfully request an extension of time to reply to Plaintiffs’ Corrected Oppositions to Defendants’ Motions for Summary Judgment (Dkts. 1624, 1625), Plaintiffs’ Corrected Joint Statement of Additional Facts in Support of Plaintiffs’ Opposition to Defendants’ Motions for Summary Judgment (“Plaintiffs’ SAMF”) (Dkt. 1626), and Coalition Plaintiffs Supplemental Statement of Additional Facts (“Supplemental SAMF”) (Dkt. 1623). In support of their motion, Defendants state as follows:

1. Late in the evening on Monday, February 13, 2023, Plaintiffs filed corrected versions of their Summary Judgment Response Briefs, of

Plaintiffs' SAMF, and for the first time filed all of the exhibits used in their brief. This delayed the time from which Defendants could begin properly working on the reply briefing.

2. Plaintiffs' SAMF is 146 pages with 302 exhibits thereto and the Coalition's Supplemental SAMF is 14 pages. Together, these are over twice the length of State Defendants' Statement of Undisputed Material Facts (Dkt. 1569), which was 79 pages.

3. The Court granted Plaintiffs an extension of time to respond to State Defendants' Motions and Statement of Material Facts, which was less than half the length of Plaintiffs' SAMF.

4. Accordingly, Defendants' request an extension from February 24, 2023 to March 13, 2023 to allow them sufficient time to properly reply to Plaintiffs' briefs and SAMFs.

5. Coalition Plaintiffs and Curling Plaintiffs have indicated they do not object to this requested extension.

6. A proposed order is attached.

Respectfully submitted this 17th day of February 2023.

/s/ Vincent R. Russo

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CERTIFICATE OF COMPLIANCE

I hereby certify that the foregoing **DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO REPLY TO PLAINTIFFS' SUMMARY JUDGMENT BRIEFING** was prepared double-spaced in 13-point Century Schoolbook pursuant to Local Rule 5.1(C).

/s/ Vincent R. Russo
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